

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15-cv-00382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY, et al.

DEFENDANTS

MOTION FOR TIME TO FILE RESPONSIVE PLEADING

COME NOW Defendants Vaughn Perret and Charles Leary, through undersigned counsel, and file this their Motion for Time to File Responsive Pleading, respectfully showing unto the Court the following, to-wit:

1. These Defendants only recently hired undersigned counsel to represent them in this matter. Accordingly, Defendants Perret and Leary are in need of additional time to confer with their lawyer and formulate a responsive pleading that addresses the Second Amended Complaint.
2. The Second Amended Complaint is voluminous, names several defendants and apparently contains a number of exhibits that were not served upon these Defendants.
3. Undersigned lawyer for Defendants Perret and Leary request an additional twenty-one (21) days in which to file their Answer and Defenses and/or such other responsive pleading to the Second Amended Complaint.
4. Undersigned lawyer for Defendants Perret and Leary certify to the Court that this motion is not being filed for purposes of delay.

WHEREFORE, Defendants Vaughn Perret and Charles Leary pray that this Court will enter an Order allowing these Defendants an additional twenty-one (21) days in which to file their Answer and Defenses and/or such other responsive pleading to the Second Amended Complaint.

Defendants herein further pray for such other relief to which they may be entered, either general or specific.

Respectfully submitted, this the 26th day of August, 2016.

VAUGHN PERRET and CHARLES LEARY,
Defendants

By /s/ Bob Wolford
Bob Wolford (#99717)

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the foregoing has been forwarded to all counsel of record via ECF.

This, the 26th day of August, 2016.

/s/ Bob Wolford
Bob Wolford (#99717)

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